

Motions

2:19-cv-05946-RBS AC2T, INC. v.
PURRINGTON

EXHIBIT A

STANDARD

United States District Court

Eastern District of Pennsylvania

Notice of Electronic Filing

The following transaction was entered by FRANK, ALAN on 1/30/2024 at 8:59 AM EST and filed on 1/30/2024

Case Name: AC2T, INC. v. PURRINGTON

Case Number: 2:19-cv-05946-RBS

Filer: AC2T, INC.

Document Number: 76

Docket Text:

MOTION to Withdraw as Attorney filed by AC2T, INC..Memorandum, Certificate of Service Service. (Attachments: # (1) Text of Proposed Order Proposed Order, # (2) Memorandum Memorandum of Law, # (3) Certificate of Service Certificate of Service)(FRANK, ALAN)

2:19-cv-05946-RBS Notice has been electronically mailed to:

ALAN L. FRANK afrank@alflaw.net, dwilk@alflaw.net, jgoldin@alflaw.net

EVAN LOUIS FRANK efrank@alflaw.net

TREVOR C. SERINE TCS@serinelaw.com, trevor.s@sefinlaw.com

2:19-cv-05946-RBS Notice will not be electronically mailed to:

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=1/30/2024] [FileNumber=19421959-0] [7c70485e539cce5cebc9168e7f41b8e18e9c5b4e5dbc42177cefb203ab382676b22d15252803b48baa67ff6a9f11b086bfea794dcf50f4e12e544dea6a8b09c7]]

Document description:Text of Proposed Order Proposed Order

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=1/30/2024] [FileNumber=19421959-1] [681a80fbfabe030aed0bb296500e0906dd0ede418dccdd110dd26d4a84a3bbcdcc0649c62c74f68df91c3ca188641bbcb3227a3c94d6ce73faf84e7634f860f3]]

Document description:Memorandum Memorandum of Law

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=1/30/2024] [FileNumber=19421959-2] [26ea67715199e1c1bc845459b087f48e97e2a39ba2600123c3197ec51bb3db1933

ae3fac59a329a2ca7549d27bad3aba5a26c69cb578a27c64b56a9c017c2d44]]

Document description:Certificate of Service Certificate of Service

Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1001600548 [Date=1/30/2024] [FileNumber=19421959-3] [8515d00897759e0df43996cd0e1da767d1d3ae4b985bbd8d8c50fe94c32ac3362ed89eebd9cdfb540864c3362c4583f8e5852e2c5b59990773c3aea4b39c1177]]

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

AC2T, Inc., d/b/a Spartan Mosquito,	:	
Plaintiff,	:	Civil Action
v.	:	Case Number: 2:19-cv-05946-RBS
Colin Purrington,	:	Jury Trial Demanded
Defendant.	:	
	:	

ORDER

AND NOW, on this _____ day of _____, 2024 upon the Motion filed by and on behalf of Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C., and upon the Court having determined that just cause exists for the relief requested therein, it is hereby

ORDERED and **DECREED** that as of the date hereof, Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. shall be permitted to withdraw as Counsel for Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in this matter.

BY THE COURT:

J.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

AC2T, Inc., d/b/a Spartan Mosquito,	:	
Plaintiff,	:	Civil Action
v.	:	Case Number: 2:19-cv-05946-RBS
Colin Purrington,	:	Jury Trial Demanded
Defendant.	:	
	:	

MOTION TO WITHDRAW AS COUNSEL

AND NOW COMES, Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. (hereinafter "ALF Law"), counsel for Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito (hereinafter "Spartan Mosquito"), filing this Motion to Withdraw as Counsel and in support thereof, respectfully represents as follows:

1. Evan L. Frank, Esquire entered his appearance on behalf of Plaintiff, Spartan Mosquito on December 17, 2019.
2. Alan L. Frank, Esquire entered his appearance on behalf of Plaintiff, Spartan Mosquito on April 15, 2020.
3. Plaintiff, Spartan Mosquito has failed to fulfill obligations to Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law regarding legal services in this matter and have been given reasonable warning that Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law will seek to withdraw as counsel unless the obligations are fulfilled.
3. Evan L. Frank, Esquire, Alan L. Frank, Esquire and ALF Law have provided certain services on the clients' behalf pursuant to the terms of a Retainer Agreement in this matter without receiving payment for said services.
5. Evan L. Frank, Esquire, Alan L. Frank, Esquire and ALF Law have communicated by telephone and email on multiple occasions with client Spartan Mosquito concerning the aforesaid obligations.

WHEREFORE, Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. pray that this court permit them to withdraw their appearance as counsel of record for the Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in the above captioned matter.

ALAN L. FRANK LAW ASSOCIATES, P.C.

A handwritten signature in blue ink, appearing to read 'A. L. Frank', is written over a horizontal line.

ALAN L. FRANK, ESQ. (#34414)

EVAN L. FRANK, ESQ. (#311994)

ALAN L. FRANK LAW ASSOCIATES, P.C.

135 Old York Road

Jenkintown, PA 19046

T: 215.935.1000/F: 215.935.1110

E-mail: afrank@alflaw.net; efrank@alflaw.net

Dated: January 30, 2024

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

AC2T, Inc., d/b/a Spartan Mosquito,
:
Plaintiff,
:
v.
:
Colin Purrington,
:
Defendant.
:

**Civil Action
Case Number: 2:19-cv-05946-RBS

Jury Trial Demanded**

**MEMORANDUM OF LAW IN SUPPORT OF
MOTION OF COUNSEL FOR PLAINTIFF AC2T, INC.,
D/B/A SPARTAN MOSQUITO FOR LEAVE TO WITHDRAW**

Alan L. Frank, Esquire, Evan L. Frank, Esquire and Alan L. Frank Law Associates, P.C. should be permitted to withdraw from representing Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in the above captioned case.

The Rules of Professional Conduct set forth the grounds and procedures for terminating representation of a client:

Rule 1.16 Declining or Terminating Representation.

- (1) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if withdrawal can be accomplished without material adverse effect on the interests of the client, or if;
- (2) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled;
- (3) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client; or
- (4) other good cause for withdrawal exists.

Plaintiff Spartan Mosquito has failed to fulfill obligations to Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law regarding legal services in this matter and have been given

reasonable warning that Alan L. Frank, Esquire, Evan L. Frank Esquire and ALF Law will seek to withdraw as counsel unless the obligations are fulfilled.

Alan L. Frank, Esquire, Evan L. Frank, Esquire and ALF Law have provided certain services on the client's behalf pursuant to the terms of a Retainer Agreement in this matter without receiving payment for said services.

Alan L. Frank, Esquire, Evan L. Frank and ALF Law communicated by telephone and mail on multiple occasions with client Spartan Mosquito concerning the aforesaid obligations.

For the foregoing reasons, Alan L. Frank, Esquire, Evan L. Frank, Esquire, and Alan L. Frank Law Associates, P.C. respectfully requests that this Honorable Court grant the request to withdraw its appearance on behalf of Plaintiff, AC2T, Inc., d/b/a Spartan Mosquito in all further proceedings in this matter.

ALAN L. FRANK LAW ASSOCIATES, P.C.



ALAN L. FRANK, ESQ. (#34414)
EVAN L. FRANK, ESQ. (#311994)
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E-mail: afrank@alflaw.net; efrank@alflaw.net

Dated: January 30, 2024

CERTIFICATE OF SERVICE

I, Alan L. Frank, Esquire, hereby certify that on January 30, 2024 I caused the foregoing to be filed via the Court's ECF system. The foregoing document is available for viewing and downloading from the PACER system. Electronic notice of this filing was sent to all counsel of record.

This Motion to Withdraw As Counsel was also served on the following via Certified U.S. Mail and E-Mail:

Jeremy Hirsch, Founder and Chairman Spartan Mosquito
AC2T, Inc., d/b/a Spartan Mosquito
8 Nemo Clark Drive
Laurel, Mississippi 39443
info@spartanmosquito.com



ALAN L. FRANK, ESQUIRE

CERTIFICATE OF SERVICE

I, Alan L. Frank, Esquire, hereby certify that on January 30, 2024 I caused the foregoing to be filed via the Court's ECF system. The foregoing document is available for viewing and downloading from the PACER system. Electronic notice of this filing was sent to all counsel of record.

This Motion to Withdraw As Counsel was also served on the following via Certified U.S. Mail and E-Mail:

Jeremy Hirsch, Founder and Chairman Spartan Mosquito
AC2T, Inc., d/b/a Spartan Mosquito
8 Nemo Clark Drive
Laurel, Mississippi 39443
info@spartanmosquito.com


ALAN L. FRANK, ESQUIRE

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For delivery information, visit our website at www.usps.com ®.	
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<input type="checkbox"/> Return Receipt (hardcopy) \$	
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<input type="checkbox"/> Adult Signature Required \$	
<input type="checkbox"/> Adult Signature Restricted Delivery \$	
Postage \$	
Total Postage and Fees \$	
Sent To Jeremy Hirsch / Spartan Mosquito	
Street and Apt. No., or PO Box No. 8 Nemo Clark Dr.	
City, State, ZIP+4® Laurel, Mississippi 39443	
PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions	